



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

February 21, 1997

Joe R. Arnold, Treasurer  
Tennessee Republican Party Federal  
Election Account Victory '92  
P.O. Box 150368  
Nashville, TN 37215

Identification Number: C00040220

Reference: October Quarterly (7/1/96-9/30/96) and 12 Day Pre-General (10/1/96-10/16/96) Reports

Dear Mr. Arnold:

This letter is to inform you that as of February 20, 1997, the Commission has not received your response to our requests for additional information dated January 29, 1997. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Andrew Dodson on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over a horizontal line.

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION  
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RQ-2

JAN 29 1997

Joe R. Arnold, Treasurer  
Tennessee Republican Party Federal  
Election Account Victory '92  
P.O. Box 150368  
Nashville, TN 37215

Identification Number: C00040220

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Arnold:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR §110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR §103.3(b). In the best interest of your committee, all reattributions, transfers-out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer-out to another account or receiving a refund.

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ELECTION ACCOUNT VICTORY '92  
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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the

TENNESSEE REPUBLICAN PARTY FEDERAL  
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contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out

and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Your report discloses receipts totalling \$180,725 from Tennessee Unity 96 Comm-Federal, which is a joint fundraising committee affiliated with your committee. Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B)

-You must make an attempt to obtain the full name, mailing address, occupation and name of employer for all individuals who contribute more than \$200 in a calendar year. Please amend your report to include the omitted information.

A committee may demonstrate "best efforts" to obtain the required information by providing the Commission with a description of its procedures for requesting the information and may also supply a copy of a solicitation: the committee must request the contributor information in initial solicitations; make follow-up requests (if necessary); report the

TENNESSEE REPUBLICAN PARTY FEDERAL  
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information; and file amendments to disclose previously unreported information. Each solicitation must include a clear and conspicuous request for the information. If a committee receives a contribution that exceeds the \$200 threshold but lacks contributor information, the committee must, within 30 days, make an additional written or oral request for the information. Please note that a written request may not include an additional solicitation or material on any other subject, other than thanking the contributor for the donation and must include a pre-addressed return post card or envelope for the contributor's response. An oral request must be documented in writing. Committees must also disclose information that was not provided by the contributor, but is available in any of the committee's records for that current election cycle. Furthermore, if a committee receives contributor information after the contributions have been reported, it must submit, with its next report, an amended memo Schedule A listing all the contributions for which additional information was received or file, on or before the next reporting date, amendments to the previous reports on which the contributions were originally disclosed. See 11 CFR §104.3(a)(4)(i) and 11 CFR §104.7.

-Please clarify all expenditures made for Advertising and Campaign Expenses on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

-Please confirm that the amount listed on Line 21(b) represents a 100% payment, from the federal account, of the total cost of each individual expenditure.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Andrew J. Dodson  
Senior Reports Analyst  
Reports Analysis Division

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary Page

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FOR LINE NUMBER  
11.a.i.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (in Full)

Tennessee Republican Party Federal Election Account - Victory '94

<b>A. Full Name, Mailing Address and ZIP Code</b> Mr. Wallace N. Rasmussen 856 Curtiswood Ln Nashville, TN 37204	<b>Name of Employer</b> SELF EMPLOYED  <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 03/06/96	<b>Amount of Each Receipt this Period</b> \$3,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$3,000.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Mr. J. R. Pickel Jr. 1201 Demonbreun St Nashville, TN 37203	<b>Name of Employer</b> Info Requested  <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 03/25/96	<b>Amount of Each Receipt this Period</b> \$3,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$3,000.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Mr. Tom F. Cone PO Box 60657 Nashville, TN 37206	<b>Name of Employer</b> Davidson  <b>Occupation</b> President	<b>Date (month, day, year)</b> 03/22/96	<b>Amount of Each Receipt this Period</b> \$3,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$3,000.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Mr. Ben H. Ernst PO Box 40485 Nashville, TN 37204	<b>Name of Employer</b> Info Requested  <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 01/03/96 03/29/96	<b>Amount of Each Receipt this Period</b> \$300.00 \$300.00
Receipt For: Federal		Aggregate Year-to-Date > \$600.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Mr. William W. McInnes 604 Westover Dr Nashville, TN 37205	<b>Name of Employer</b> Info Requested  <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 02/28/96	<b>Amount of Each Receipt this Period</b> \$3,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$3,000.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Mr. Dortch Oldham 3701 W End Ave One Whitehall Nashville, TN 37205	<b>Name of Employer</b> Davidson  <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 02/26/96	<b>Amount of Each Receipt this Period</b> \$1,200.00
Receipt For: Federal		Aggregate Year-to-Date > \$1,200.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Susan & Luke Simons 502 Park Hill Dr Nashville, TN 37205	<b>Name of Employer</b> J. C. Bradford  <b>Occupation</b> Managing Partner	<b>Date (month, day, year)</b> 03/06/96	<b>Amount of Each Receipt this Period</b> \$3,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$3,000.00	

SUBTOTAL of Receipts This Page (optional)

\$16,800.00

TOTAL This Period (last page this line number only)

## SCHEDULE A

## ITEMIZED RECEIPTS

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11.a.i.

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## NAME OF COMMITTEE (in Full)

Tennessee Republican Party Federal Election Account - Victory '96

<b>A. Full Name, Mailing Address and ZIP Code</b> Mr. Tom F. Cone PO Box 60657 Nashville, TN 37206	<b>Name of Employer</b> Info Requested Occupation President	<b>Date (month, day, year)</b> 08/29/96	<b>Amount of Each Receipt this Period</b> \$5,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$8,000.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Mr. Ben H. Ernst PO Box 40485 Nashville, TN 37204	<b>Name of Employer</b> Info Requested Occupation Info Requested	<b>Date (month, day, year)</b> 07/02/96	<b>Amount of Each Receipt this Period</b> \$300.00
Receipt For: Federal		Aggregate Year-to-Date > \$900.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Mr. Charles J. Kane 413 W Tyne Dr Nashville, TN 37205	<b>Name of Employer</b> Info Requested Occupation Info Requested	<b>Date (month, day, year)</b> 08/13/96	<b>Amount of Each Receipt this Period</b> \$630.00
Receipt For: Federal		Aggregate Year-to-Date > \$750.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Mr. Leon May 230 Ensworth Ave Nashville, TN 37205	<b>Name of Employer</b> Self Employed Occupation Real Estate Broker	<b>Date (month, day, year)</b> 08/06/96 09/04/96	<b>Amount of Each Receipt this Period</b> \$100.00 \$200.00
Receipt For: Federal		Aggregate Year-to-Date > \$300.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Mr. Howard H. Hoffman 450 Allied Dr Nashville, TN 37211	<b>Name of Employer</b> Southern Cutting Dye Occupation Manager	<b>Date (month, day, year)</b> 09/19/96	<b>Amount of Each Receipt this Period</b> \$250.00
Receipt For: Federal		Aggregate Year-to-Date > \$250.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Mr. J. Roy Wauford Jr. 231 W End Hts Lebanon, TN 37087	<b>Name of Employer</b> Info Requested Occupation Info Requested	<b>Date (month, day, year)</b> 08/29/96	<b>Amount of Each Receipt this Period</b> \$2,500.00
Receipt For: Federal		Aggregate Year-to-Date > \$2,500.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Mr. Robert C. Brannon 600 Chelmsford Pl Nashville, TN 37215	<b>Name of Employer</b> Info Requested Occupation Info Requested	<b>Date (month, day, year)</b> 07/08/96	<b>Amount of Each Receipt this Period</b> \$300.00
Receipt For: Federal		Aggregate Year-to-Date > \$900.00	

SUBTOTAL of Receipts This Page (optional)

\$9,280.00

TOTAL This Period (last page this line number only)

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
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FOR LINE NUMBER

11.a.i.

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## NAME OF COMMITTEE (In Full)

Tennessee Republican Party Federal Election Account - Victory '96

<b>A. Full Name, Mailing Address and ZIP Code</b> Mr. Robert W. Hyndman PO Box 709 Hermitage, TN 37076	<b>Name of Employer</b> Info Requested <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 05/01/96	<b>Amount of Each Receipt this Period</b> \$300.00
Receipt For: Federal		Aggregate Year-to-Date > \$300.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Mr. Robert M. O'Dear Jr. 3901 Trimble Rd Nashville, TN 37215	<b>Name of Employer</b> OB Serv. Tours <b>Occupation</b> Business Consultant	<b>Date (month, day, year)</b> 05/13/96	<b>Amount of Each Receipt this Period</b> \$250.00
Receipt For: Federal		Aggregate Year-to-Date > \$250.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Mr. James H. Graves 330 Commerce St Nashville, TN 37201	<b>Name of Employer</b> J.C. Bradford <b>Occupation</b> banker	<b>Date (month, day, year)</b> 06/24/96	<b>Amount of Each Receipt this Period</b> \$250.00
Receipt For: Federal		Aggregate Year-to-Date > \$250.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Mr. David Kustoff 782 Paradise Drive Cordova, TN 38018	<b>Name of Employer</b> Info Requested <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 05/06/96	<b>Amount of Each Receipt this Period</b> \$1,200.00
Receipt For: Federal		Aggregate Year-to-Date > \$1,200.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> Mr. Bailey Robinson 4409 Chickering Ln Nashville, TN 37215	<b>Name of Employer</b> Wright Industries, Inc. <b>Occupation</b> Executive	<b>Date (month, day, year)</b> 04/29/96	<b>Amount of Each Receipt this Period</b> \$3,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$3,000.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Ms. Barbara M. Rogers 686 Island Dr Palm Beach, FL 33480	<b>Name of Employer</b> Self <b>Occupation</b> Private investor	<b>Date (month, day, year)</b> 06/17/96	<b>Amount of Each Receipt this Period</b> \$1,200.00 And
Receipt For: Federal		Aggregate Year-to-Date > \$1,200.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Mrs. Marquerite Salles 102 Bellebrook Cir Nashville, TN 37205	<b>Name of Employer</b> Info Requested <b>Occupation</b> Info Requested	<b>Date (month, day, year)</b> 04/01/96	<b>Amount of Each Receipt this Period</b> \$3,000.00
Receipt For: Federal		Aggregate Year-to-Date > \$3,000.00	

SUBTOTAL of Receipts This Page (optional)

\$9,200.00

TOTAL This Period (last page this line number only)



Use separate schedule(s)  
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11.a.1.

## SCHEDULE A

## ITEMIZED RECEIPTS

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## NAME OF COMMITTEE (in Full)

Tennessee Republican Party Federal Election Account - Victory '96

A. Full Name, Mailing Address and ZIP Code Mrs. Marquerite Salles 102 Bellebrook Cir Nashville, TN 37205	Name of Employer Info Requested	Date (month, day, year) 08/29/96	Amount of Each Receipt this Period \$2,500.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$5,500.00	
B. Full Name, Mailing Address and ZIP Code Ms. Marilyn Prospero 4184 Lake Meadow Way Louisville, TN 37777	Name of Employer Anderson Tress Co.	Date (month, day, year) 07/29/96	Amount of Each Receipt this Period \$100.00 \$150.00
	Occupation Office Manager	09/09/96	
Receipt For: Federal	Aggregate Year-to-Date >	\$350.00	
C. Full Name, Mailing Address and ZIP Code Dr. & Mrs. Richard N. Schott 1807 Iroquois Ct Murfreesboro, TN 37130	Name of Employer Info Requested	Date (month, day, year) 09/12/96	Amount of Each Receipt this Period \$500.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$500.00	
D. Full Name, Mailing Address and ZIP Code Mr. D.L. Schmitz 944 Rayner St Memphis, TN 38114	Name of Employer Schmitz Waterproofing	Date (month, day, year) 08/19/96	Amount of Each Receipt this Period \$500.00
	Occupation President/Contractor		
Receipt For: Federal	Aggregate Year-to-Date >	\$500.00	
E. Full Name, Mailing Address and ZIP Code Mr. Howard Wall 1980 Old Fort Pkwy Murfreesboro, TN 37129	Name of Employer Info Requested	Date (month, day, year) 08/29/96	Amount of Each Receipt this Period \$5,000.00 \$1,000.00
	Occupation Info Requested	09/12/96	
Receipt For: Federal	Aggregate Year-to-Date >	\$6,000.00	
F. Full Name, Mailing Address and ZIP Code Dr. David McKnight 2234 N Woods Dr Murfreesboro, TN 37130	Name of Employer Info Requested	Date (month, day, year) 09/12/96	Amount of Each Receipt this Period \$1,000.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$1,000.00	
G. Full Name, Mailing Address and ZIP Code Mr. James O'Brien III 315 Eventide Dr Murfreesboro, TN 37130	Name of Employer Info Requested	Date (month, day, year) 09/12/96	Amount of Each Receipt this Period \$250.00
	Occupation Info Requested		
Receipt For: Federal	Aggregate Year-to-Date >	\$250.00	

SUBTOTAL of Receipts This Page (optional)

\$11,000.00

TOTAL This Period (last page this line number only)

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
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Detailed Summary PagePAGE 1 OF 2  
FOR LINE NUMBER  
11.c.

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## NAME OF COMMITTEE (in Full)

Tennessee Republican Party Federal Election Account - Victory '96

A. Full Name, Mailing Address and ZIP Code Eastman Chemical PAC PO Box 511 Kingsport, TN 37662	Name of Employer  Occupation	Date (month, day, year) 07/11/96	Amount of Each Receipt this Period \$3,000.00
Receipt For: Federal	Aggregate Year-to-Date >	\$3,000.00	
B. Full Name, Mailing Address and ZIP Code N.R.A. PAC 11250 Waples Mill Road Fairfax, VA 22030	Name of Employer  Occupation	Date (month, day, year) 09/24/96	Amount of Each Receipt this Period \$4,950.00
Receipt For: Federal	Aggregate Year-to-Date >	\$4,950.00	
C. Full Name, Mailing Address and ZIP Code T.W.H.B.G.A. PAC Post Office Box 286 Lewisburg, TN 37091	Name of Employer  Occupation	Date (month, day, year) 08/29/96	Amount of Each Receipt this Period \$5,000.00
Receipt For: Federal	Aggregate Year-to-Date >	\$5,000.00	
D. Full Name, Mailing Address and ZIP Code Mississippi Band of Choctaw Indians Post Office Box 6010 Philadelphia, MS 39350	Name of Employer  Occupation	Date (month, day, year) 08/29/96	Amount of Each Receipt this Period \$1,000.00
Receipt For: Federal	Aggregate Year-to-Date >	\$1,000.00	
E. Full Name, Mailing Address and ZIP Code AM South PAC Post Office Box 11007 Attn: Graham Champion Birmingham, AL 35288	Name of Employer  Occupation	Date (month, day, year) 09/04/96	Amount of Each Receipt this Period \$2,000.00
Receipt For: Federal	Aggregate Year-to-Date >	\$2,000.00	
F. Full Name, Mailing Address and ZIP Code TFRW PAC TFRW -c/o Annette Pannell 436 Berkeley Road Kingsport, TN 37660	Name of Employer  Occupation	Date (month, day, year) 09/12/96	Amount of Each Receipt this Period \$1,000.00
Receipt For: Federal	Aggregate Year-to-Date >	\$1,000.00	
G. Full Name, Mailing Address and ZIP Code Petroleum Association of America PAC 1901 N. Fort Myer Drive Suite 1200 Arlington, VA 22209	Name of Employer  Occupation	Date (month, day, year) 09/12/96	Amount of Each Receipt this Period \$1,000.00
Receipt For: Federal	Aggregate Year-to-Date >	\$1,000.00	

SUBTOTAL of Receipts This Page (optional)

\$17,950.00

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